

publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

25. Plaintiff's evidence establishes that Defendant is a habitual and persistent BitTorrent user and copyright infringer.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I
Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

(A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

(B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

(C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

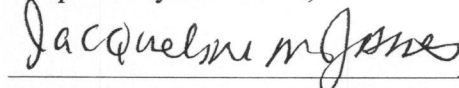
(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

By:

A handwritten signature in cursive script, appearing to read "Jacqueline M. James", is written over a horizontal line.

Jacqueline M. James, Esq. (1845)

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Attorneys for Plaintiff

File Hashes for IP Address 72.68.143.50

ISP: Verizon FiOS

Physical Location: Pleasantville, NY

Hit Date UTC	File Hash	Title
09/27/2014 14:36:32	8993DFD0089C63C22229C59361D4CB163A8F79A4	Cat Fight
09/21/2014 20:19:25	0C485A86BB4EB968F1BDCD9D362FF25C98C72879	Fun For Three
08/06/2014 23:10:49	A0B580B71CC4FF6E0737CA2ED983951BADA56528	Breakfast At Eves
07/27/2014 22:38:17	F9A56F0765FF9D66033BBADCEF3AAE52CB75A4E8	Highrise Rendezvous
07/20/2014 12:11:45	9B18995FF4BF5957CB9CB3A4E3119A82475181C3	Cut Once More Please
07/20/2014 09:37:59	E94F753F299D4968019055C9C7A8DBB9C837C5DF	Summertime Lunch
06/09/2014 13:03:47	84ABF3B1B881BF16E463DEE19669223AB87B562F	Sex With Glasses
06/09/2014 10:30:26	17E9C7AAB73C2845D20844533DD246E8A8A81F03	From Three to Four Part 2
04/19/2014 14:18:33	6D49FF84A616C511D7546281E353CF1102501445	Double Tease
03/23/2014 03:20:59	A1AD1EFC25ECACCAF835F06862CEB5EC40D1289F	Deep Blue Passion
02/08/2014 13:57:18	85E12154C5682384996C362A4F88F18E29252F5F	Submissive Seduction
02/08/2014 12:07:55	5320BFD3FB93A574ACF86561A72115E9AD79320C	I Can Not Wait
02/03/2014 14:06:42	2DD8681E585A4C365B2BC5C1FDF5D642B1A3CABF	So Young
02/03/2014 13:26:23	225411BA06B97B0EBC217138030D5E7863FFEBE4	Risky Business
01/13/2014 19:17:18	9C15AAB6DE602840D5C7FC02459384270FEB32A6	Playing Dress Up
01/12/2014 12:41:46	35B9318841CB88B87764CECD646FB20E90A56096	Getting Ready For You
01/06/2014 11:17:09	56B890DBF45818C57D350DFCE7A9F33615B24F6E	My Naughty Girl
10/17/2013 21:44:08	B83B2B451FFF165795F5E6EF18292168282C6359	Grow Up With Me
09/30/2013 22:33:21	93BDFE5206C0DDF69D1C1ECF584E06CA5A3D5712	Almost Famous
09/26/2013 10:17:22	6AFD23904D4B47B58B0EC42120140DF80270E89C	Love with a View
09/16/2013 00:19:03	9F3BB8FFB46702FBF1716393050782F0AC056575	Erotic Stretching and Sex
09/16/2013 00:17:49	8253B11CB0538D632B448340AEC0BA9FC7184239	Malibu Moments

EXHIBIT A

SNY25

Hit Date UTC	File Hash	Title
07/11/2013 04:03:54	24611441049DF8ADF2F98C75A6D9BEFD26E701FF	Oh Mia
07/11/2013 03:59:18	BFFA463E61447F200B096D9E7120FDDDB1F858CC0	Going Strong

Total Statutory Claims Against Defendant: 24

Copyright in Site for IP Address 72.14.14.40

ISP: Verizon FiOS

Location: Bloatville, NY

File Hash	Hit Date UTC	File Hash	Hit Date UTC	File Hash	Hit Date UTC
PA0001804637	09/27/2013	09/30/2013	09/30/2013	09/30/2013	09/30/2013
PA0001804637	08/06/2014	08/06/2014	08/06/2014	08/06/2014	08/06/2014
PA0001804637	08/26/2014	08/26/2014	08/26/2014	08/26/2014	08/26/2014
PA0001804637	07/01/2014	07/01/2014	07/01/2014	07/01/2014	07/01/2014
PA0001804637	03/21/2014	03/21/2014	03/21/2014	03/21/2014	03/21/2014
PA0001804637	04/27/2014	04/27/2014	04/27/2014	04/27/2014	04/27/2014
PA0001804637	09/08/2013	09/08/2013	09/08/2013	09/08/2013	09/08/2013
PA0001804637	05/01/2014	05/01/2014	05/01/2014	05/01/2014	05/01/2014
PA0001804637	05/13/2014	05/13/2014	05/13/2014	05/13/2014	05/13/2014
PA0001804637	01/10/2014	01/10/2014	01/10/2014	01/10/2014	01/10/2014
PA0001804637	07/06/2013	07/06/2013	07/06/2013	07/06/2013	07/06/2013
PA0001804637	10/17/2013	10/17/2013	10/17/2013	10/17/2013	10/17/2013
PA0001804637	07/15/2014	07/15/2014	07/15/2014	07/15/2014	07/15/2014
PA0001804637	01/27/2014	01/27/2014	01/27/2014	01/27/2014	01/27/2014
PA0001804637	03/25/2013	03/25/2013	03/25/2013	03/25/2013	03/25/2013
PA0001804637	08/08/2013	08/08/2013	08/08/2013	08/08/2013	08/08/2013
PA0001804637	10/23/2013	10/23/2013	10/23/2013	10/23/2013	10/23/2013
PA0001804637	05/13/2013	05/13/2013	05/13/2013	05/13/2013	05/13/2013

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